

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**SUSAN R. PEASE,
PLAINTIFF**

v.

**CHRISTIAN BRIGGS AND BRIGGS
VENTURES, INC.,
DEFENDANTS**

§
§
§
§
§
§

CIVIL ACTION NO. 1:12-cv-00851

CONTENTIONS OF PLAINTIFF, SUSAN R. PEASE

Comes now, Plaintiff Susan R. Pease, and files her contentions in this case, to wit:

Susan Pease entrusted a rare and valuable Coin to the Defendants to sell for her at a fair market value, subject to her approval. After four years, Defendant Christian Briggs represented to Todd Griffiths, a friend and business associate, that he personally owned the coin and sold him the coin without informing Susan Pease. When Griffiths learned that Plaintiff owned the coin, the Defendants conspired with Griffiths to enter into a sham sale and convince Susan Pease to sell the coin for less than its true value. Although promises were made that she would be paid, Susan Pease never received any proceeds from that sale. Later, she learned that the Coin sold at a public auction for a fair value of \$184,000.00. Now, Defendants seek to deflect all blame onto Todd Griffiths and accuse him of being the real culprit, while Defendants never contacted Susan Pease, never informed her of the prior sale of the coin to Griffiths, and never paid her for the Coin. Griffiths claims he never received funds from the Defendants to pay Plaintiff and admits to his part in the Defendants' conspiracy to defraud Susan Pease with the phony sale. Susan Pease seeks the full value of the coin plus damages for the scam perpetrated by the Defendants, and recovery of reasonable and necessary attorney fees.

Respectfully submitted,

By: /s/ R. Lyn Stevens
R. Lyn Stevens

**STEVENS, BALDO, FREEMAN &
LIGHTY, LLP**

550 Fannin Street, Suite 700

Beaumont, TX 77701

(409) 835-5200

(409) 838-5638 Facsimile

stevens@sbf-law.com

**ATTORNEYS FOR PLAINTIFF,
SUSAN R. PEASE**

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2014, I electronically filed the foregoing *Contentions of Plaintiff Susan R. Pease* with the Clerk of the Court for the U.S. District Court, Western District of Texas, using the electronic case filing system for the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys who have consented in writing to accept this notice as service of this document by electronic means. In addition, a true and correct copy of the foregoing instrument was served on counsel for Defendants via email as follows:

Bailey Brauer PLLC
Campbell Centre I
8150 N. Central Expy, Suite 935
Dallas, Texas 75206

Attn: Alexander Brauer

abrauer@baileybrauer.com

Attn: Clayton E. Bailey

cbailey@baileybrauer.com

Attn: Benjamin L. Stewart

bstewart@baileybrauer.com

Attn: Paul E. Green

pgreen@baileybrauer.com

/s/ R. Lyn Stevens
R. Lyn Stevens